

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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CELY CASTILLO,

Case No.: 20-CV-4337 (NGG) (PK)

Plaintiff,

NOTICE OF MOTION

-against-

**PLAZA MOTORS OF BROOKLYN INC., JOHN
ROSATTI, ADAM ROSATTI, and LUIS SIMEOLI**

Defendants.
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PLEASE TAKE NOTICE, that pursuant to the Federal Arbitration Act, 9 U.S.C. § 1 *et seq.*, Rule 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, the Declaration of Vera Nuhi and the Memorandum of Law submitted herewith, Defendants, Plaza Motors of Brooklyn Inc., John Rosatti, Adam Rosatti, and Luis Simeoli, will move this Court before the Honorable Nicholas G. Garaufis, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, for an Order compelling arbitration and dismissing the Complaint, or in the alternative, staying this proceeding pending the outcome of the arbitration; and for such other remedies as the Court deems just and proper.

Dated: Lake Success, New York
January 8, 2021

Respectfully submitted,

MILMAN LABUDA LAW GROUP, PLLC

/s/ Jamie S. Felsen, Esq.
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